



U.S. Department of Justice

*United States Attorney
Southern District of New York*

SDNY
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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

MEMO ENDORSED

May 12, 2015

5/13/15
Order signed
with all defendants'
consent

VIA ECF

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Mirilashvili et al., 14 Cr. 810 (CM)

Dear Judge McMahon:

We write with respect to the ongoing production of discovery in the above-captioned case. Because we anticipate that current and future productions may contain significant amounts of personal information regarding third-parties – such as names, dates of birth, social security numbers, and the like – the Government believes a protective order is appropriate. We have drafted a proposed order which we have shared with counsel for all defendants in this case, and each has consented, on behalf of his or her client, to the entry of such an order.

Accordingly, and so as to facilitate continued productions, the Government would respectfully request that the Court endorse the proposed order which, as noted, has previously been shared with and approved by defense counsel.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/
Edward B. Diskant
Brooke E. Cucinella
Assistant United States Attorneys
(212) 637-2294/2477

Cc: Defense counsel (via ECF)
Enclosure